

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PLATINUM-BEECHWOOD LITIGATION.

Civil Action No. 18-cv-6658 (JSR)

MARTIN TROTT and CHRISTOPHER SMITH, as
Joint Official Liquidators and Foreign
Representatives of PLATINUM PARTNERS
VALUE ARBITRAGE FUND L.P. (in Official
Liquidation) and PLATINUM PARTNERS VALUE
ARBITRAGE FUND L.P. (in Official Liquidation),

Civil Action No. 18-cv-10936 (JSR)

Plaintiffs,

- against -

PLATINUM MANAGEMENT (NY) LLC, *et al.*,

Defendants.

PLEASE TAKE NOTICE THAT, Plaintiffs Martin Trott and Christopher Smith, as Joint Official Liquidators and Foreign Representatives of Platinum Partners Value Arbitrage Fund L.P. (in Official Liquidation), and Platinum Partners Value Arbitrage Fund L.P. (in Official Liquidation), by and through their counsel, upon the memorandum of law, the supporting declaration and exhibits attached thereto, and such further materials as may be submitted in support thereof, will move this Court as soon as counsel can be heard before the Honorable Jed S. Rakoff, United States District Judge for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, Courtroom 14B, 500 Pearl St., New York, New York 10007, for an Order precluding introduction of evidence or argument relating to the March 20, 2016 Release Agreement, and for such further relief as the Court deems just and proper.

Dated: New York, New York
March 8, 2022

HOLLAND & KNIGHT LLP

By: /s/ Warren E. Gluck

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Liquidators and Foreign Representatives of
Platinum Partners Value Arbitrage Fund
L.P. (in Official Liquidation), and for
Platinum Partners Value Arbitrage Fund
L.P. (in Official Liquidation)*